

EXHIBIT A

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October 17, 2013

VIA LNFS & Email: (SRiccardulli@mwe.com)

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McDermott Will & Emery
340 Madison Avenue
New York, New York 10173-1922

RE: Commonwealth of Puerto Rico, et al. v. Shell Oil Co., et al., 07-civ-10470
Plaintiffs' October 10-11, 2013 Noticed Depositions

Dear Stephen:

Pursuant to the Court's October 15, 2013 bench order, plaintiffs below identify the depositions noticed on October 10 – 11, 2013 that will definitely need to go forward. The remaining deposition notices were served out of an abundance of caution and may or may not be necessary to take, depending largely upon the degree of cooperation from defendants in providing fully prepared Rule 30(b)(6) witnesses, agreeing to stipulations or declarations on matters that are not seriously disputed, etc. Depositions not listed below remain outstanding until such time as plaintiffs can confirm that there is no longer a need for these additional witnesses. Prompt scheduling of the witnesses and depositions listed below will facilitate the prompt resolution of these outstanding notices.

I note that the Commonwealth, a single party, has to date presented witnesses for depositions for 38 days. In contrast, 6 of the roughly 15 defendant families have produced witnesses for depositions for a total of 19 days. This is almost a 2:1 ratio in favor of the 40 plus named defendants. As you know, a number of defendants, including ExxonMobil Corporation and Esso Standard Oil Puerto Rico, have repeatedly postponed depositions that are responsive to notices issued over six months ago. Additionally, due to the presentation of inadequately prepared corporate representatives, the Commonwealth has been forced to seek additional, individual depositions.

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Stephen J. Riccardulli, Esq.
October 17, 2013
Page 2 of 3

That being said, plaintiffs will take the following depositions:

Tauber Oil

Plaintiffs will depose Donald Aleong, Patricia Bock, Michael Price and David J. Swayne. Plaintiffs believe these four depositions can be conducted in one to two days.

HOVIC & HOVENSA

Plaintiffs will depose Hess Corporation, Frederick Barrant and Woodworth Cummings.

ConocoPhillips Company & Chevron Phillips Chemical Puerto Rico Core, LLC

Plaintiffs will depose Nick Horler, Mark D. Scharre and Fred Sisson.

Esso Puerto Rico & Exxon Mobil

Plaintiffs will depose Samuel Cruz, Carlos Figueroa, Arturo Hernandez, Robert McGrath, Augusto Muñoz-Lucot, Norman Salas and Helen Sia.

Sol Puerto Rico & Shell Defendants

Plaintiffs will take the Rule 30(b)(6) depositions of Sol Puerto Rico Ltd. (f/k/a Shell Company Puerto Rico Ltd.), Shell Chemical Yabucoa, Inc., Shell Oil Company and Shell Trading (US) Company. Plaintiffs will also depose Luis Fernandez, Jose Marrero, R. Krug Fenz, David Lewis, Carlos Rodriguez, Hans Rudzen and Eneida Hernandez Morales.

Plaintiffs note that the Shell Defendants were recently compelled to provide discovery and have yet to present any witnesses.

Lyondell Chemical Company

Plaintiffs will take the Rule 30(b)(6) deposition of Lyondell.

Stephen J. Riccardulli, Esq.
October 17, 2013
Page 3 of 3

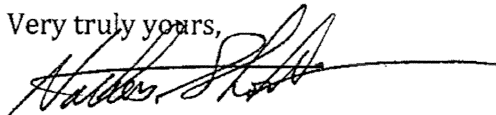
Sunoco Defendants

Plaintiffs will depose Augustin Lledo, Stephen R. Walker, Jose Ferrer and Juan Lopez as well as the Sunoco defendants' Rule 30(b)(6) witness. However, this Rule 30(b)(6) deposition could potentially be addresses by Lopez or Ferrer individually.

Non-Parties

Plaintiffs will depose Reynaldo Fuentes and Mike Pizarro.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Nathan Short', with a long horizontal line extending to the right.

Nathan Short

cc: All Counsel of record (via LNFS)